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From: MHeller@savethebay.cbf.org
Sent: Tuesday, October 05, 2004 1:38 PM
To: FarmBillRules
Subject: Attn: Conservation Security Program
Attachments: ATTACHMENT.TXT; cbf comments 10.4.04.doc

<<cbf comments 10.4.04.doc>>

Please find attached the comments of the Chesapeake Bay Foundation for the CSP Final Rules. thank you, michael heller

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October 5, 2004

Craig Dickerson, Program Manager
Financial Assistance Programs Division
Natural Resources Conservation Service
P.O. Box 2890
Washington, DC 20013-2890

RE: Comments on Conservation Security Program Interim Final Rule

Dear Mr. Dickerson:

The Chesapeake Bay Foundation appreciates the opportunity to comment on the Final Rule for the Conservation Security Program (CSP). We believe that this program has tremendous potential to benefit farmers in our region, and to significantly reduce agricultural pollution, which currently is the single largest source of Bay pollution.

The Chesapeake Bay Foundation (CBF), founded in 1967, is the largest conservation organization dedicated solely to saving the Chesapeake Bay. Our motto, "Save the Bay," defines the organization's mission and commitment. With headquarters in Annapolis, Maryland, and state offices in Maryland, Virginia and Pennsylvania, CBF works throughout the Chesapeake's 64,000-square-mile watershed to protect and restore the Bay with programs in environmental education, restoration and protection. CBF is supported by 110,000 active members and has a staff of more than 180 fulltime employees.

Over the past three years, CBF has actively supported and helped develop the Conservation Security Program (CSP) because it is a key program to meeting crucial environmental and economic goals for agriculture in the Chesapeake region. CBF has participated in numerous national panels, focus groups, agency meetings, and congressional lobbying to help make CSP a program that works for farmers and the environment. Recently, CBF has also convened a working group of farmers, farm organizations, agency staff, and university researchers to craft recommendations for how green payments like CSP can most effectively be structured in the Chesapeake region.

CBF anticipates large environmental benefits from the proposed Conservation Security Program and sees USDA playing a critical role in the effort to restore the health of the Chesapeake Bay. CBF is very enthusiastic about the future role of the CSP that will reward farmers who have maintained conservation practices for many years, and will motivate others to establish conservation practices.

We are very concerned that the Final Rules have the flexibility in both eligibility requirements and payment structure to encourage many farmers through economic

incentives to provide environmental benefits that were envisioned by Congress when it passed the 2002 Farm Bill. CBF urges you to:

1. Ensure that the Final Rules have the flexibility to provide a full, comprehensive program for all farmers, and one that can respond to specific regional needs.

We recognize the funding limits that NRCS has had to work within for the initial implementation of CSP. It is critical however, that the final rules do not limit the potential to expand the program eligibility to all farmers everywhere when CSP is fully funded. NRCS must not compromise the long-term structure and success of the program based on the first year funding levels. The final rule needs to be written with the future in mind, so that the program can be expanded to *all* producers who develop an approved conservation plan, without limitations based on geographic area or production system or farm size. We believe that it is critical to have the flexibility within CSP rules to allow each region of the country to address its most pressing needs.

2. Eliminate the 'per acre' caps on contract payments as this unfairly hurts regions such as the Chesapeake where farm sizes are smaller than the national average.

Tying payment caps to acreage and a percentage of land rents is unfair to farmers in the Chesapeake region. Historically, farm bill payments to farmers have denied the Chesapeake Bay region its full fair share of funds based on the importance of our region's agriculture to the nation. The Chesapeake region taxpayers and legislators are becoming more knowledgeable about the Farm Bill and are determined that our region's farmers be fairly treated by farm programs. In the Chesapeake the average farm size is 155 acres, compared to the national average farm size of 441 acres. By capping CSP farm payments based on a percent of farm acreage rental rates this program will favor large farms over medium and small farms, hurting our region's farmers.

3. The Final Rules should encourage more farmers to raise their environmental standards through their participation in CSP, rather than require existing high standards in order to be eligible.

As an environmental organization we are very concerned that CSP be a program that can get farmers to raise their levels of environmental farming practices. If the eligibility criteria require farmers to already have in place very high environmental practices this will not encourage the average farmer to improve their level of environmental farming practices. CSP should be the comprehensive program that allows NRCS to work with farmers to advance farm conservation on working lands. It should not simply be a program to reward good farmers, but should encourage more environmental farming among a broad group of farmers. We are very supportive of setting high environmental standards, but we believe that farmers should be given the opportunity to achieve these standards through participation in CSP over a reasonably established time schedule.

Thank you again for the opportunity to provide these comments. CBF believes that the Conservation Security Program rule has the potential to be one of the most important aspects of the 2002 Farm Bill. However, the rules must be developed to ensure that it is implemented so that all farmers are fairly treated, and that it can provide the maximum benefits to the environment.

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Sincerely,

Kelly M. O'Neill
Pennsylvania Agricultural
Specialist

William H. Street
Director of Watershed
Restoration

Michael Heller
CBF Clagett Farm
Manager